

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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Northfield Insurance Company,	:	No. 3:23-cv-00461-MCC
	:	
	:	
Plaintiff	:	(Magistrate Judge Carlson)
v.	:	
	:	
JVA Deicing, Inc., Joseph Tuzze, Cargill	:	Electronically filed
Incorporated and Carol Donahue,	:	
individually as Administratrix of the	:	
Estate of Mark Donahue, deceased	:	
Defendants	:	

**UNOPPOSED MOTION OF DEFENDANT, CAROL DONAHUE,**  
**INDIVIDUALLY AND AS ADMINISTRATRIX OF THE ESTATE OF**  
**MARK DONAHUE, DECEASED FOR ENLARGEMENT OF TIME OF**  
**THIRTY (30) DAYS TO FILE HER RESPONSE TO PLAINTIFF’S**  
**COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant, Carol Donahue, individually and as Administratrix of the Estate of Mark Donahue, deceased, (Defendant Donahue), by and through her attorneys, Caputo and Mariotti, P.C., hereby move this Honorable Court for an enlargement of time of thirty (30) days, until May 12, 2023, to file her response to Plaintiff’s Complaint (Doc. 1) and, in support thereof, avers as follows:

1. On or about March 15, 2023, Plaintiff, Northfield Insurance Company (Plaintiff), filed a Complaint against Defendant Donahue, JVA Defendants and Cargill Incorporated seeking Declaratory Judgment Relief. (Doc. 1)

2. Defendant Donahue was served with the Summons and Complaint on or about March 22, 2023, making her response to the Complaint due April 12, 2023. (Doc. 11)

3. Counsel for Defendant Donahue requires additional time to compose her response to the Complaint, and therefore respectfully request a thirty (30) day enlargement of her time, to Monday, May 12, 2023 to respond to the Complaint.

4. The Motion is made in good faith and not for purposes of delay.

5. Counsel for Northfield, Michael J. McLaughlin, Esquire was contacted and represented that she consents to the requested thirty (30) day extension.

**WHEREFORE**, Defendant Donahue, respectfully requests that the Court grant her an extension of time until May 12, 2023 to file her response to Northfield's Complaint.

Respectfully submitted:

**CAPUTO & MARIOTTI LAW OFFICES**

By: /s/Christopher P. Caputo  
Christopher P. Caputo, Esquire  
Atty ID #: 73446  
Joseph E. Mariotti, Esquire  
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**CERTIFICATE OF SERVICE**

I, CHRISTOPHER P. CAPUTO, ESQUIRE, hereby certify that on the 6<sup>TH</sup> day of April, 2023, I served a true and correct copy of an Motion for Enlargement of time by ECF to all counsel of record.

By: /S/ Christopher P. Caputo  
Christopher P. Caputo  
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Defendants	:	

**CERTIFICATE OF CONCURRENCE**

I, Christopher P. Caputo, Esquire, hereby certify that Michael J. McLaughlin, counsel for the Plaintiff, Northfield Insurance Company, concurs in the instant Motion for Enlargement of Time.

**BY:/s/Christopher P. Caputo**  
**Christopher P. Caputo, Esquire**